

FILED

APR 17 2013

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JENNIFER MILLER,

Defendant.

No.

4:13CR 00150CDP

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. At all times relevant, JENNIFER MILLER was employed by Reservations LLC (hereinafter "the company") as an accountant intermittently from 1999 until 2009.
2. As part of her duties as an accountant, JENNIFER MILLER was responsible for handling the financial aspects of the company, including paying the company's bills. Attendant to those duties, JENNIFER MILLER had access to the company's Bank of America accounts ending in 2220 and 0113 (hereinafter collectively "the Bank of America accounts").
3. From on or about February 24, 2006 and continuing through on or about August 31, 2009, JENNIFER MILLER exploited her position with the company as an accountant by accessing the company's Bank of America accounts and converting those funds for her personal use without the company's knowledge or consent.

4. Specifically, JENNIFER MILLER made repeated transfers of money from the company's Bank of America accounts in aggregate greater than \$5,000 directly to her creditors in order to satisfy personal debts and expenses.

5. On or about April 22, 2008 and continuing through on or about June 22, 2009 within the Eastern District of Missouri and elsewhere,

JENNIFER MILLER,

the Defendant herein, did knowingly and willfully transmit and transfer and caused to be transmitted and transferred in interstate commerce securities and money, of the value of \$5,000 or more, in aggregate, which said securities and money had been stolen, converted, and taken by fraud, to wit, Defendant stole money from Reservations LLC's Bank of America account ending in 0113 to which she had access and thereafter made interstate electronic fund transfers to personal creditors.

In violation of Title 18, United States Code, Sections 2314 and 2.

COUNT TWO

The Grand Jury further charges that:

6. Paragraphs 1 through 4 of this Indictment are re-alleged and incorporated herein by reference.

7. On or about April 16, 2008 and continuing through on or about August 31, 2009 within the Eastern District of Missouri and elsewhere,

JENNIFER MILLER,

the Defendant herein, did knowingly and willfully transmit and transfer and caused to be transmitted and transferred in interstate commerce securities and money, of the value of \$5,000 or more, in aggregate, which said securities and money had been stolen, converted, and taken by fraud, to wit, Defendant stole money from Reservations LLC's Bank of America account ending in 2220 to which she had access and thereafter made interstate electronic fund transfers to personal creditors.

In violation of Title 18, United States Code, Sections 2314 and 2.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

Stephen Casey
Assistant United States Attorney